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Attorney for Defendant
JOSE CURIEL

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)	Case No. 2:22-cr-000151-WBS
)	
Plaintiff,)	STIPULATION AND ORDER TO
)	CONTINUE STATUS CONFERENCE AND
v.)	EXCLUDE TIME
)	
JOSE CURIEL, ET AL)	
)	Date: May 6, 2024
Defendants.)	Time: 9:00 a.m.
)	Judge: William B. Shubb
)	

IT IS HEREBY STIPULATED, by and between the parties, through their respective counsel, Assistant United States Attorney Justin Lee, counsel for plaintiff, Clemente Jimenez, counsel for Roberto Tostado-Cadenas, and Assistant Federal Defender Megan T. Hopkins, counsel for Jose Curiel, that the respective change of plea hearing and status conference scheduled for May 6, 2024, be continued to **July 15, 2024, at 9:00 a.m.**

Defense counsel continues to review discovery and conduct investigation in this case. Mr. Tostado-Cadenas requires additional time to prepare for the change of plea hearing. The parties anticipate an initial plea offer from the government regarding Mr. Curiel prior to the next status conference, and defense counsel for Mr. Curiel will require additional time to review the offer and respond to the government. The parties believe a continuance to July 15, 2024, will permit defense counsel the additional time necessary to conclude pretrial investigation, identify and interview any pertinent witnesses, obtain records, and finalize any further pre-plea negotiations.

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2 The parties agree that the ends of justice served by resetting the status conference date
3 outweigh the best interest of the public and the defendant in a speedy trial. Therefore, the parties
4 agree that time is excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), (B)(iv) (Local Code T4).
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6 Dated: May 1, 2024

Respectfully submitted,

7 HEATHER E. WILLIAMS
8 Federal Public Defender

9 /s/ Megan T. Hopkins
10 MEGAN T. HOPKINS
11 Assistant Federal Defender
12 Attorney for Defendant
13 JOSE CURIEL

14 Dated: May 1, 2024

/s/ Clemente Jimenez
15 CLEMENTE JIMENEZ
16 Attorney for Defendant
17 ROBERTO TOSTADO-CADENAS

18 PHILLIP A. TALBERT
19 United States Attorney


20 Dated: May 1, 2024

/s/ Justin Lee
21 JUSTIN LEE
22 Assistant United States Attorney
23 Attorney for Plaintiff
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ORDER

IT IS HEREBY ORDERED that the change of plea hearing and status conference scheduled for May 6, 2024, at 9:00 a.m. are continued to **July 15, 2024, at 9:00 a.m.** The time period through July 15, 2024, is excluded under the Speedy Trial Act pursuant to 18 U.S.C. § 3161(h)(7)(A) and (B)(i) and (iv), as the ends of justice served by granting the continuance outweigh the best interest of the public and the defendant in a speedy trial.

Dated: May 2, 2024


WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE